

# McKool Smith

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December 4, 2023

By ECF

The Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 2270  
New York, New York 10007

Re: Stein and Lhote v. Skatteforvaltningen  
23 Civ. 2508 (NRB)

Dear Judge Buchwald:

We write on behalf of Plaintiffs-Counterclaim Defendants Matthew Stein and Jerome Lhote and jointly with counsel for Counterclaim Defendant Luke McGee.

We respectfully request permission to file an overlength pre-motion conference letter concerning various discovery disputes that the parties have been unable to resolve.

Those letters are typically limited to 3 pages under your Honor's Individual Practices.

In order to provide an appropriate amount of background to the unresolved discovery disputes and in the hopes that the Court can resolve them on the basis of letters alone, we request that Plaintiffs and McGee be permitted up to file a combined letter of up to 7 pages in length.

By e-mail, dated November 27, 2023, Plaintiffs and McGee sought SKAT's consent to file a letter of up to 7-pages in length and indicated that they would agree to SKAT's having the same number of pages in response. As of the filing of this letter, SKAT has not responded to our request for its consent.

Application  
denied  
Naomi  
Reice  
Buchwald  
USDS  
12/14/23

Respectfully submitted,

/s/

Daniel W. Levy

cc: All Counsel (by ECF)

**McKool Smith**

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